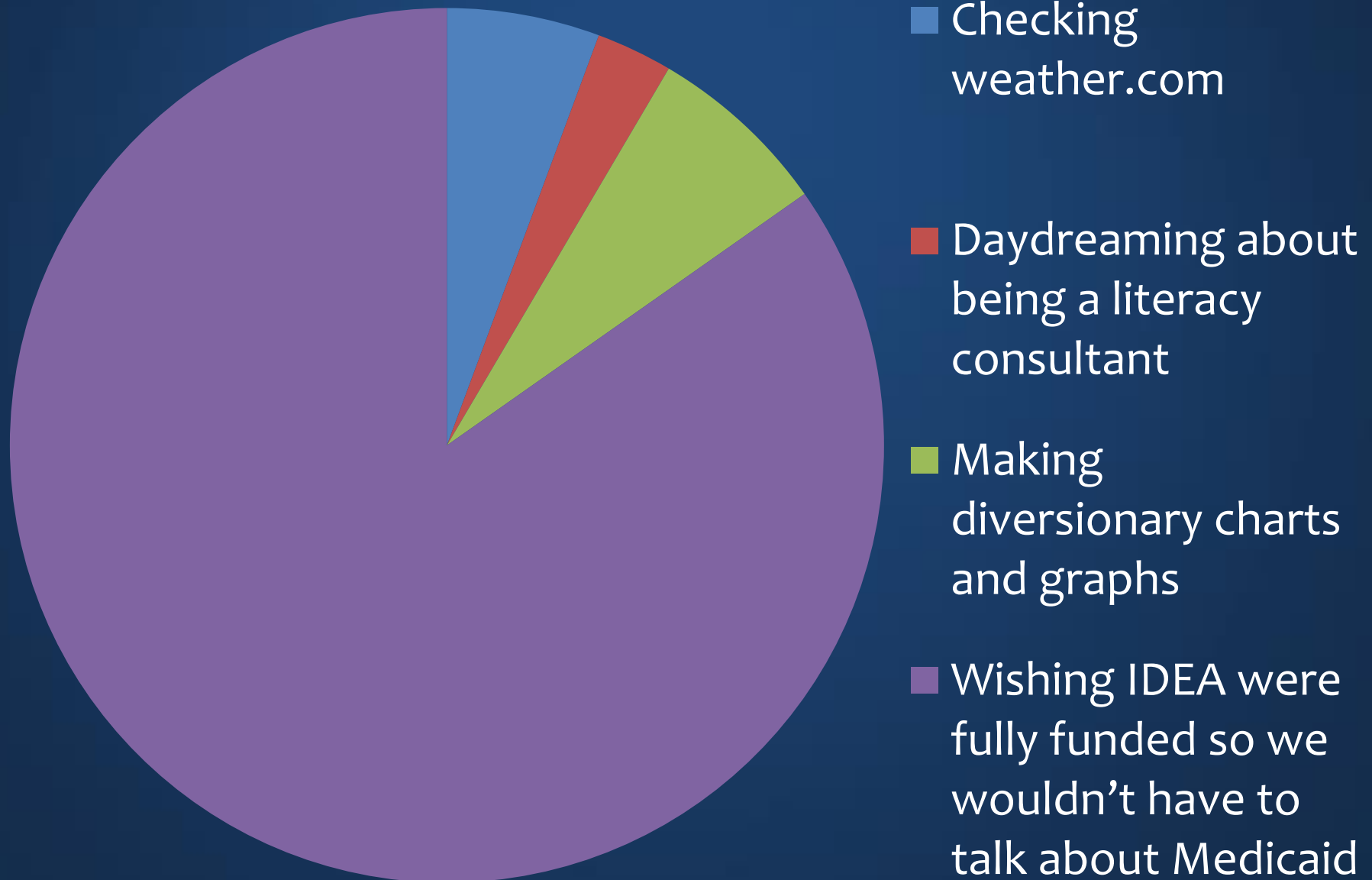


# **MEDICAID UPDATES**

*2014 EC Administrators Institute  
Greensboro, NC  
March 11, 2014*

*Lauren Holahan, NCDPI OT/Medicaid Consultant*

# TIME USAGE PREPARING THIS PRESENTATION



# **DMA LEA STAKEHOLDER PANEL**

## **NCDPI Representatives**

- Perry Flynn
- Lauren Holahan
- Bill Hussey
- Laurie Ray

## **LEA Representatives**

- Julie Aul, Cumberland
- Cindy Booth, New Hanover
- Renee Chapman, Gaston
- Sam Dempsey, Winston-Salem/Forsyth
- Christy Grant, Nash-Rocky Mount
- Tom Griffin, Rutherford
- Karen Hamilton, Wake
- Mike Marcela, Watauga
- Jill McKenna, Johnston
- Mike Melton, Polk
- Stefanie Nance, Alamance-Burlington
- Emily Summey, Surry

# TODAY'S TOPICS

- Utilization
- Visit limits and private SLP services
- LEA RAC audits
- Documentation

# UTILIZATION

- \$8.3 million in MAC cost recovery (2011-12)
- \$10.8 million in FFS cost recovery (2011-12)
- 101 LEAs participating FFS (2014)
- 19 LEAs submitting nursing claims (2011-12)

# **SPEECH VISIT LIMITS**

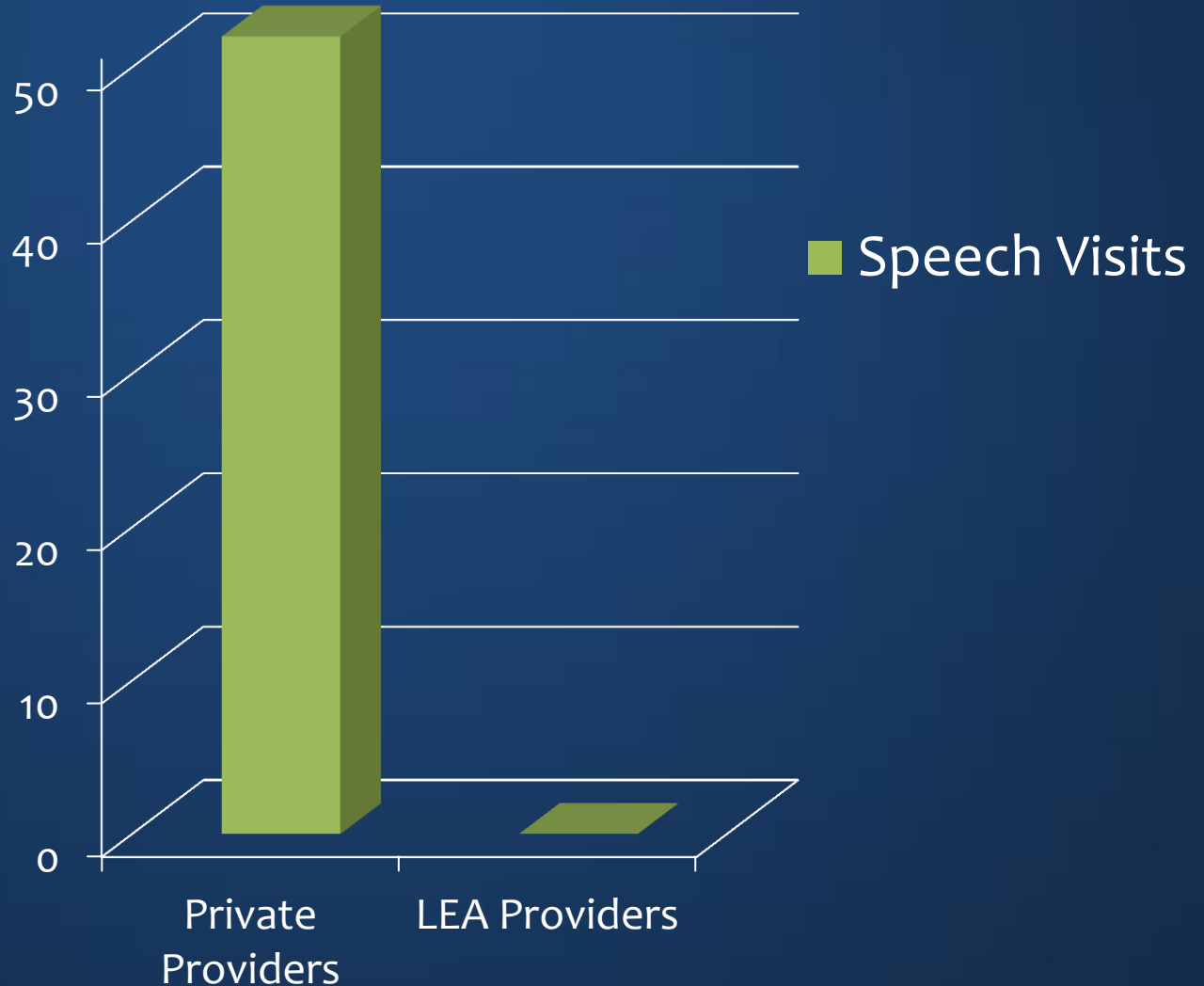
# VISIT LIMIT POLICY

DMA Policy 10A 5.6

Medical Necessity Visit Guidelines for SLP:

- Mild Impairment range of visits: 6–26
- Moderate Impairment range of visits: Up to 46
- Severe Impairment range of visits: Up to 52

# HOW MOST PRIVATE SPEECH THERAPY PROVIDERS WOULD LIKE TO ALLOCATE ALLOWABLE VISITS



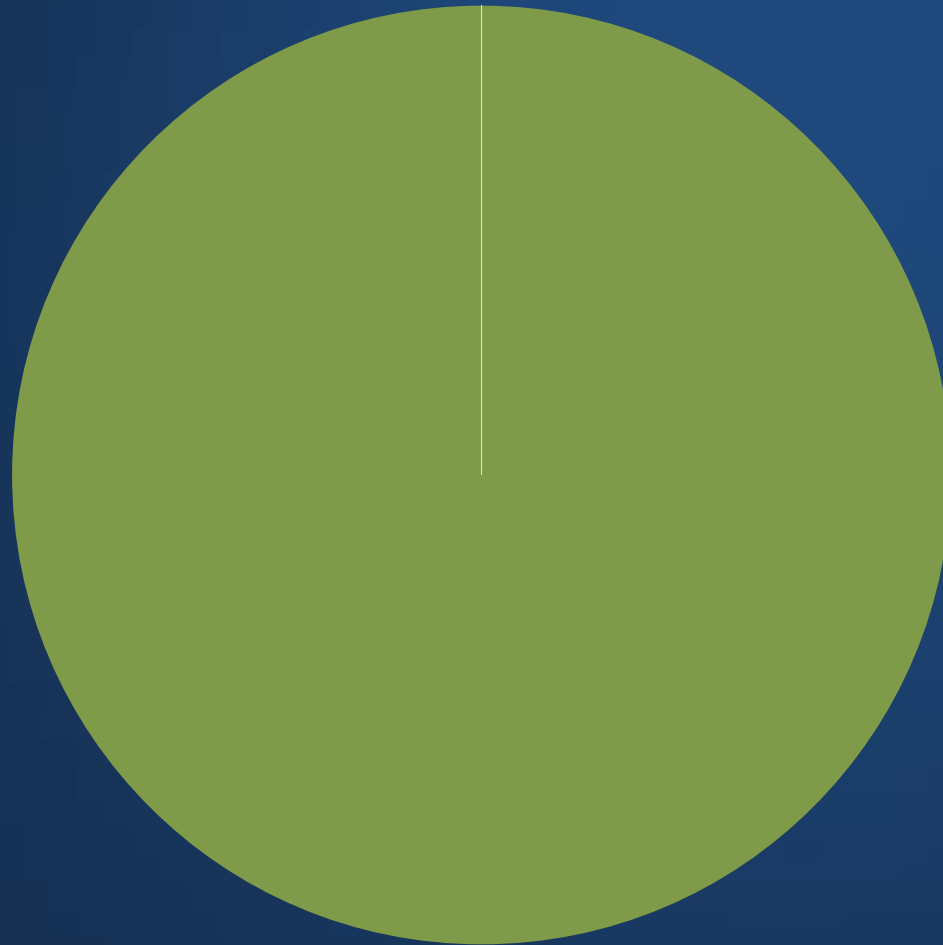


# DPI EC DIVISION RESPONSE

- Visit limits are arbitrary
- Confidentiality concerns related to requests for copy of IEP
- Have asked DMA to stop:
  - Requiring independent practitioners (IP) to access students' educational records as part IP prior approval procedure
  - Including LEA services in visit limit count, particularly when LEAs are not seeking DMA reimbursement for school-based services

# **RECOVERY AUDIT CONTRACTOR (RAC) PROGRAM**

# PREVIOUS MEDICAID LEA AUDITS



- Medicaid LEA audits resulting in recoupment
- Medicaid LEA audits with no findings
- Medicaid LEA audits with instructive findings

# **NEW DMA RECOVERY AUDIT CONTRACTOR (RAC)**

Health Management Systems  
(HMS) = NC RAC auditor

- Email – [NCRACII@HMS.com](mailto:NCRACII@HMS.com)
- Web site –  
<http://www.medicaid-rac.com/ncproviders>
- HMS Provider portal –  
<https://ecenter.hmsy.com>
- Phone – 855-438-6415

# **RAC RULES**

- LEA audits starting after March 15, 2014
- Nurses conducting initial review
- 36-month look back from date claim was paid
- Up to 300 claim records every 45 days can be requested
- 3-6 month extrapolation frame

# RAC FOCUS

- MD order matches dates of service and services billed
- Services rendered support and substantiate the condition
- Units billed match units documented
- Current plan of care
- Proper supervision of assistants
- Services correspond to diagnosis

# **DOCUMENTATION**

**WHEN THERAPISTS COMPLAIN ABOUT HOW MUCH  
MEDICAID DOCUMENTATION ADDS TO THEIR  
WORKLOAD, I MAKE THIS FACE SO THEY THINK I'M  
LISTENING**



**BUT I'M ACTUALLY NOT**





# DOCUMENTATION

- Licensure board standards apply
- Narrative format helps
- Clear record of assistant supervision, when relevant
- Services provided by student interns allowable/  
documented by supervising therapist
- Evaluations:
  - copy of each test performed or a summary listing all test results
  - written evaluation report

# INTERVENTION NOTES

- Minimum of four components for treatment notes:
  - Goal targeted
  - Skilled interventions used → medical necessity must be evident
  - Student's response
  - Plan for continued treatment
- Duration of service in minutes
- Signature and credentials of provider

**RECAP**

# Things to Do at EC Administrator Institute

**UBER  
COOL**

**PRETTY  
COOL**

**NOT  
COOL**

Take group  
selfie like  
Ellen, et al.  
at the  
Oscars

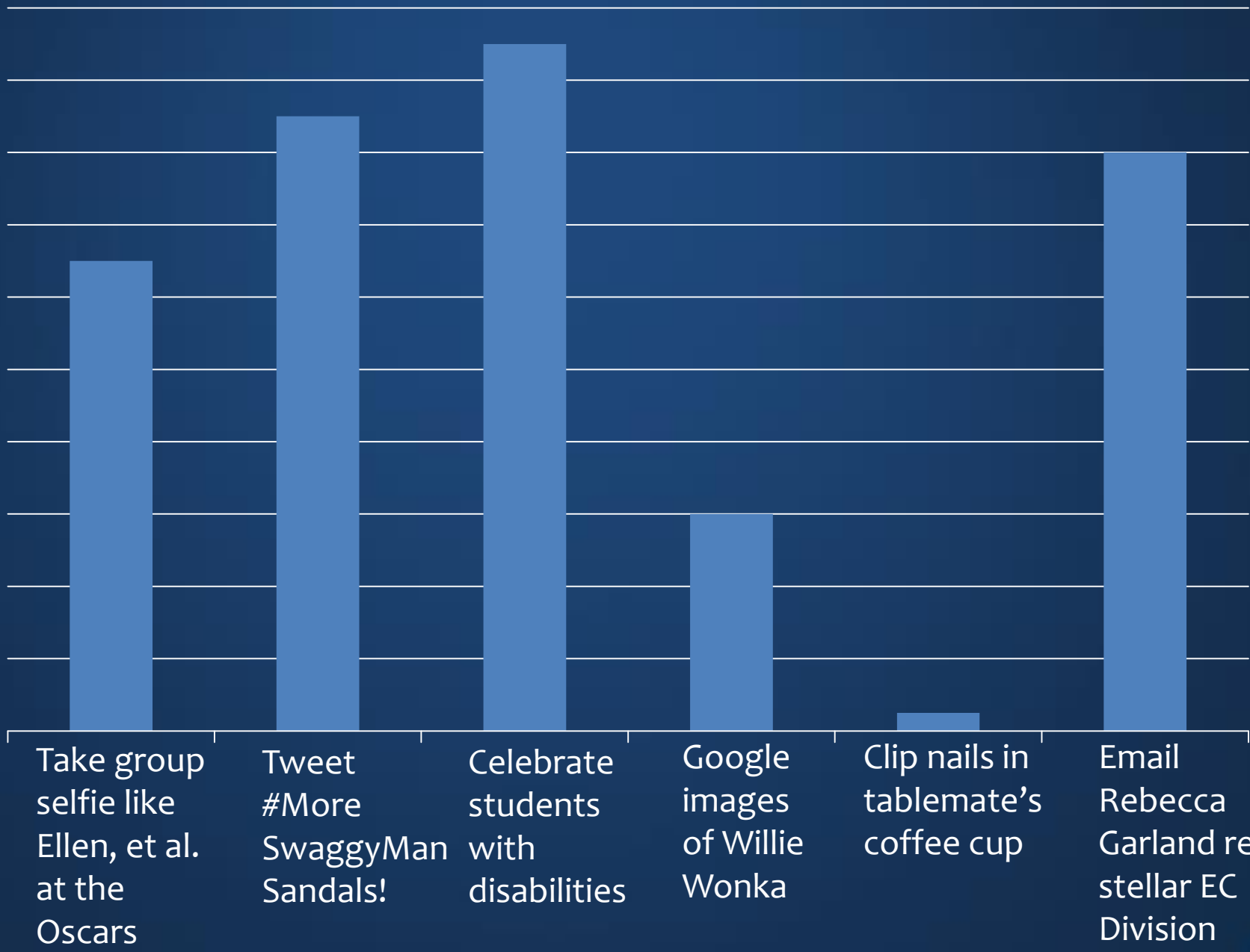
Tweet  
#More  
SwaggyMan  
Sandals!

Celebrate  
students  
with  
disabilities

Google  
images  
of Willie  
Wonka

Clip nails in  
tablemate's  
coffee cup

Email  
Rebecca  
Garland re:  
stellar EC  
Division



# KEY POINTS

- NCDPI is advocating for separate medical necessity analysis for LEAs
- RAC audits are about to begin; DPI Medicaid consultants are available to help
- Therapists need a system to “write it once”
- Self-audit and peer review strongly encouraged

# MEDICAID RESOURCES

- DPI Medicaid website:  
<http://ec.ncpublicschools.gov/finance-grants/medicaid-in-education>
- Medicaid Policy 10C: Local Education Agencies  
<http://www.ncdhhs.gov/dma/mp/8h.pdf>
- National Alliance on Medicaid in Education  
<http://www.medicaidforeducation.org/>
- DPI Medicaid listserv – send request to Lauren at  
[lauren\\_holahan@med.unc.edu](mailto:lauren_holahan@med.unc.edu)

# **QUESTIONS & ANSWERS**



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(919) 636-1827

[laurie\\_ray@med.unc.edu](mailto:laurie_ray@med.unc.edu)

<http://www.med.unc.edu/ahs/physical/schoolbasedpt>

**Lauren Holahan, OT/Medicaid Consultant**

(919) 428-7201

[lauren\\_holahan@med.unc.edu](mailto:lauren_holahan@med.unc.edu)

<http://www.med.unc.edu/ahs/ocsci/nc-school-based-ot>